

**American Arbitration Association
CONSTRUCTION INDUSTRY ARBITRATION RULES**

HOSPITALITY BUILDERS, INC.,

Case No.: 02-20-0000-1049

Claimant,

SPOKANE SOUTH MEDICAL, LLC

Respondent.

REPLY TO ANSWERING STATEMENT AND COUNTERCLAIMS

Claimant Hospitality Builders, Inc., for its reply to Respondent Spokane South Medical, LLC's Answering Statement and Counterclaims, states as follows:

1. Claimant denies and disputes all claims and allegations in Respondent's Answering Statement and Counterclaims. Claimant denies Respondent is entitled to any relief whatsoever against Claimant.
2. Claimant adopts herein by reference the allegations and claims for relief contained in Claimant's Demand for Arbitration.
3. Respondent's alleged claims and rights to relief are barred by one or more of the following: Respondent's breach of contract, default, nonpayment and nonperformance; Respondent's wrongful interference, obstruction, delays, and prevention of Claimant's performance; contractual exclusions, disclaimers and limitations of Respondent's remedies; waiver; estoppel; assumption of risk; contributory negligence or fault; failure(s) or lack of consideration; failure(s) of conditions precedent; laches and delay; statute of frauds and merger; failure to mitigate damages; offset; and all other matters constituting any defense or avoidance to Respondent's claims. Claimant reserves all its claims, defenses, offsets, rights and remedies against Respondent.

EXHIBIT D

Dated: January 31, 2020.

HALL LAW FIRM

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